

1 NICHOLAS J. SANTORO (Nev. Bar No. 532)  
2 JASON D. SMITH (Nev. Bar No. 9691)  
3 **SANTORO WHITMIRE**  
4 10100 W. Charleston Blvd., Suite 250  
5 Las Vegas, Nevada 89135  
Tel.: (702) 948-8771 / Fax: (702) 948-8773  
E-mail: nsantoro@santoronevada.com  
jsmith@santoronevada.com

6 MICHAEL EISENBERG (*pro hac vice* admitted)  
7 **HOLLAND & KNIGHT LLP**  
8 31 West 52nd Street  
9 New York, New York 10019  
Tel.: (212) 513-3529 / Fax: (212) 385-9010  
Email: michael.eisenberg@hklaw.com

10 STACEY H. WANG (*pro hac vice* admitted)  
11 **HOLLAND & KNIGHT LLP**  
12 400 South Hope Street, 8th Floor  
13 Los Angeles, CA 90071  
Tel.: (213) 896-2400 / Fax: (213) 896-2450  
Email: stacey.wang@hklaw.com

14 *Attorneys for Plaintiffs*

15 **UNITED STATES DISTRICT COURT**

16 **FOR THE DISTRICT OF NEVADA**

17 SEOUL SEMICONDUCTOR CO., LTD. and  
18 SEOUL VIOSYS, CO., LTD.

Case No.: 2:18-cv-00383-RFB-NJK

19 Plaintiffs,  
20 vs.

**STIPULATION AND [PROPOSED  
ORDER] FOR ENTRY OF CONSENT  
JUDGMENT**

21 PHILCOR T.V. & ELECTRONIC LEASING,  
22 INC. d/b/a ENERGYAVENUE.COM,

23 Defendants.

24 Plaintiffs Seoul Semiconductor Co., Ltd. and Viosys Co., Ltd. (collectively “Seoul”) and  
25 Defendant Philcor T.V. & Electronic Leasing, Inc. dba Energyavenue.com (“Philcor”) stipulate  
26 to entry of Consent Judgment against Philcor and in favor of Seoul on Seoul’s claim of patent

1 infringement, and any potential defenses or counterclaims, including any defense of non-  
2 infringement or invalidity. The stipulation is based upon the following:

- 3 1. Seoul alleges, and Philcor does not dispute, that Philcor has sold lighting devices  
4 and/or LED light bulbs that were manufactured by third parties and infringe U.S.  
5 Patent No. 9,627,435, U.S. Patent No. 9,093,627, U.S. Patent No. 9,577,157, U.S.  
6 Patent No. 7,700,960, U.S. Patent No. 8,168,988, U.S. Patent No. 8,860,331; U.S.  
7 Patent No. 8,829,552; U.S. Patent No. 8,716,946; U.S. Patent No. 9,716,210; U.S.  
8 Patent No. 7,951,626; U.S. Patent No. 9,450,155; and U.S. Patent No. 8,664,638  
9 (collectively, “the Patents in Suit”) that are owned by Seoul.
- 10 2. Philcor does not contest that the Patents in Suit are valid.
- 11 3. The Parties therefore agree that a Consent Judgment should be entered in favor of  
12 Seoul and against Philcor on Seoul’s claim of patent infringement of the Patents in  
13  
14 Suit.

16 Accordingly, the Parties stipulate and request that the Court enter the following Consent  
17 Judgment, attached hereto as Exhibit A.

18 DATED this 13th day of August, 2018.

19 **SANTORO WHITMIRE**

21 /s/ Jason D. Smith  
22 Nicholas J. Santoro (Nev. Bar No. 532)  
23 Jason D. Smith (Nev. Bar 9691).  
24 10100 W. Charleston Blvd., Suite 250  
25 Las Vegas, Nevada 89135  
Tel.: (702) 948-8771 / Fax: (702) 948-8773  
E-mail: nsantoro@santoronevada.com  
jsmith@santoronevada.com

26 Michael Eisenberg (*pro hac vice* admitted)  
27 **HOLLAND & KNIGHT LLP**  
31 West 52nd Street

28 DATED this 13th day of August, 2018

**HOLLEY DRIGGS WALCH FINE  
WRAY PUZEY & THOMPSON**

21 /s/ Brian W. Boschee  
22 Brian W. Boschee (Nev. Bar No. 7612)  
23 James D. Boyle (Nev. Bar. No. 8384)  
24 400 South Fourth Street, Third Floor  
25 Las Vegas, Nevada 89101  
Tel.: (702) 791-0308 / Fax: (702)791-1912  
Email: bboschee@nevadafirm.com  
jboyle@nevadafirm.com  
26 *Attorneys for Defendants*

1 New York, New York 10019  
2 Tel.: (212) 513-3529 / Fax: (212) 385-9010  
Email: michael.eisenberg@hklaw.com

3 Stacey H. Wang (*pro hac vice* admitted)  
4 **HOLLAND & KNIGHT LLP**  
5 400 South Hope Street, 8th Floor  
6 Los Angeles, CA 90071  
7 Tel.: (213) 896-2400 / Fax: (213) 896-2450  
8 Email: stacey.wang@hklaw.com

9  
10 *Attorneys for Plaintiffs*

11 IT IS SO ORDERED.  
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13 RICHARD F. BOULWARE, II  
14 UNITED STATES DISTRICT JUDGE

15 DATED this 31st day of August, 2018.  
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# **Exhibit A**

Consent Judgment

1 NICHOLAS J. SANTORO (Nev. Bar No. 532)  
2 JASON D. SMITH (Nev. Bar No. 9691)  
3 **SANTORO WHITMIRE**  
4 10100 W. Charleston Blvd., Suite 250  
5 Las Vegas, Nevada 89135  
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E-mail: nsantoro@santoronevada.com  
jsmith@santoronevada.com

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15 **UNITED STATES DISTRICT COURT**

16 **FOR THE DISTRICT OF NEVADA**

17 SEOUL SEMICONDUCTOR CO., LTD. and  
18 SEOUL VIOSYS, CO., LTD.

Case No.: 2:18-cv-00383-RFB-NJK

19 **CONSENT JUDGMENT**

Plaintiffs,

20 vs.

21 PHILCOR T.V. & ELECTRONIC LEASING,  
22 INC. d/b/a ENERGYAVENUE.COM,

23 Defendants.

24 **CONSENT JUDGMENT**

25 Based upon the Stipulation and Proposed Order for Entry of Consent Judgment submitted  
26 by Plaintiffs Seoul Semiconductor Co., Ltd. and Seoul Viosys Co., Ltd. (collectively, "Seoul")

1 and Philcor T.V. & Electronic Leasing, Inc. dba Energyavenue.com (“Philcor”), consent  
2 judgment against Philcor and in favor of Seoul is hereby entered, as follows:

- 3 1. U.S. Patent No. 9,627,435, U.S. Patent No. 9,093,627, U.S. Patent No. 9,577,157,  
4 U.S. Patent No. 7,700,960, U.S. Patent No. 8,168,988, U.S. Patent No. 8,860,331;  
5 U.S. Patent No. 8,829,552; U.S. Patent No. 8,716,946; U.S. Patent No. 9,716,210;  
6 U.S. Patent No. 7,951,626; U.S. Patent No. 9,450,155; and U.S. Patent No. 8,664,638  
7 (collectively, “the Patents in Suit”) asserted by Seoul against Philcor in this matter are  
8 not invalid.
- 9 2. Philcor has sold lighting devices and/or LED light bulbs that were manufactured by  
10 third parties and have been accused by Seoul in the above-captioned cases. Seoul  
11 contends, and Philcor does not dispute, that such lighting devices and/or LED light  
12 bulbs infringe the Patents in Suit.
- 13 3. Seoul and Philcor shall bear their own costs, expenses and attorneys’ fees.
- 14 4. This Court retains exclusive jurisdiction of this matter to enforce this Consent  
15 Judgment.

16 **IT IS SO ORDERED.**

17 

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20 UNITED STATES DISTRICT JUDGE

21 Dated: \_\_\_\_\_